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8 CAMACHO, AND JESSICA PAN, on behalf of  
themselves and all others similarly situated  
9

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15 Attorneys for Defendant  
16 TWITTER, INC.

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA

19  
20 EMMANUEL CORNET, JUSTINE DE  
CAIRES, GRAE KINDEL, ALEXIS  
21 CAMACHO, AND JESSICA PAN, on behalf  
of themselves and all others similarly situated,

22 Plaintiffs,

23 v.

24 TWITTER, INC.

25 Defendant.  
26  
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Case No. 3:22-cv-06857-JD

**STIPULATION AND [PROPOSED] ORDER  
ON HEARING DATE AND REPLY  
BRIEFING ON PLAINTIFFS'  
EMERGENCY MOTION FOR  
PROTECTIVE ORDER**

1 WHEREFORE, pursuant to Northern District Civil Local Rule 6-3 Plaintiffs Emmanuel  
 2 Cornet, Justine de Caires, Grae Kindel, Alexis Camacho, and Jessica Pan (“Plaintiffs”) and  
 3 Defendant Twitter, Inc. (“Twitter”) have met and conferred and submit this Stipulation and  
 4 [Proposed] Order regarding the hearing date and reply deadline for Plaintiffs’ Emergency Motion  
 5 for a Protective Order.

6 WHEREAS, on November 9, 2022, Plaintiffs filed their Emergency Motion for a  
 7 Protective Order (ECF No. 7) (“Motion”);

8 WHEREAS, on November 10, 2022, Plaintiffs filed an Emergency Motion to Shorten  
 9 Time for the briefing schedule and hearing on their Motion (ECF No. 11);

10 WHEREAS, on November 14, 2022, the Court issued an order directing Twitter to  
 11 respond to the Motion by November 21, 2022 (ECF No. 13).

12 Due to the significant interests and expectations of the employees impacted by the  
 13 reduction in force, and Twitter’s desire to minimize the impacted employees’ continued  
 14 uncertainty regarding the severance they will be offered, Twitter is agreeable to have Plaintiffs’  
 15 Motion resolved on an expedited schedule. As a result, the Parties respectfully request that the  
 16 Court set the following schedule: Twitter will file its Opposition on November 21, per the  
 17 Court’s order; Plaintiffs will file their reply on November 23; and the Motion will be set for  
 18 hearing on Tuesday, November 29, or as otherwise convenient for the Court during the week of  
 19 November 28 to December 2. If the Court adopts the Parties’ proposed schedule in material  
 20 substance, Twitter will not seek releases until after the Motion is heard and decided.

21  
 22 Dated: November 16, 2022

LICHTEN & LISS-RIORDAN, PC

23  
 24 By: /s/ Shannon Liss-Riordan  
 25 Shannon Liss-Riordan  
 26 Thomas Fowler  
 27 Attorneys for Plaintiffs  
 28 EMMANUEL CORNET, JUSTINE DE  
 CAIRES, GRAE KINDEL, ALEXIS  
 CAMACHO, AND JESSICA PAN, on  
 behalf of themselves and all others similarly  
 situated

1 Dated: November 16, 2022

MORGAN, LEWIS & BOCKIUS LLP

2  
3 By: /s/ Eric Meckley  
4 Eric Meckley  
5 Brian D. Berry  
6 Attorneys for Defendant  
7 TWITTER, INC.

8 **FILER'S ATTESTATION**

9 Pursuant to Local Rule 5-1(h)(3) regarding signatures, I attest that all other signatories  
10 listed, and on whose behalf this filing is submitted, concur in the document's content and have  
11 authorized the filing.

12 DATED: November 16, 2022

MORGAN, LEWIS & BOCKIUS LLP

13 By: /s/Eric Meckley  
14 Eric Meckley

15 Attorneys for Defendant  
16 TWITTER, INC.

17 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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20 Dated: \_\_\_\_\_

\_\_\_\_\_  
21 The Honorable James Donato  
22 United States District Judge  
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